

Exhibit 6



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

May 7, 2021

By Email

Nicholas Bassett, Esq.
Paul Hastings LLP
2050 M Street, N.W.
Washington, D.C. 20036
nicholasbassett@paulhastings.com

Brian S. Rosen
Member of the Firm
d +1.212.969.3380
f 212.969.2900
brosen@proskauer.com
www.proskauer.com

Re: *In re: Commonwealth of Puerto Rico, et al.* (D.P.R. Case No. 17-3283) Discovery
Relating to Disclosure Statement for Second Amended Title III Plan

Dear Nick,

I write in response to your letter, dated April 23, 2021 (the “April 23 Letter”), regarding discovery relating to the Second Amended Disclosure Statement,¹ as well as your accompanying requests for production, Rule 30(b)(6) notices, and individual deposition notices for two members of the Oversight Board, Justin Peterson and David Skeel.

The Oversight Board disagrees with your assertion that discovery is necessary or appropriate in connection with the Court’s consideration of the adequacy of the Second Amended Disclosure Statement. In particular, there is no basis for your request for a 30(b)(6) deposition of the Oversight Board, as well as depositions of two of the Oversight Board’s members, on issues relating to the adequacy of the Second Amended Disclosure Statement. Further, certain of the information you request was already provided to you pursuant to the terms of the Mediation Agreement, which requires all participating parties to maintain confidential any information provided in the course of mediation. Mediation Agreement, § IV. Given that context, it is particularly inappropriate for you to now seek “discovery” about what you already know, as opposed to simply requesting changes to the Second Amended Disclosure Statement. In addition, many of your requests are not relevant to the determination of the adequacy of the Second Amended Disclosure Statement pursuant to 11 U.S.C. § 1125, and, instead, relate solely to issues relating to the confirmation of the plan of adjustment (to the extent they are relevant at all). Interestingly, several of the requests relate to proposed plan treatment and classification of claims expressly requested by the Creditors’ Committee during the mediation process. With respect to the balance of your requests, many seek information the Debtors already intend to make available to all creditors through the Disclosure Statement Depository.²

¹ “Second Amended Disclosure Statement” refers to the *Disclosure Statement for the Second Amended Title III Plan of Adjustment of the Commonwealth of Puerto Rico, et al. (Corrected)* [ECF No. 15988].

² The “Disclosure Statement Depository” refers to the depository established pursuant to the *Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the*

Proskauer»

May 7, 2021
Page 2

Nevertheless, in the interest of avoiding a dispute, the Oversight Board will review your requests and serve formal responses and objections. In the event that any of the information requested is relevant to the issues to be addressed at the July 13, 2021 Disclosure Statement Hearing (as defined in the Disclosure Statement Hearing Order), such information will be deposited into the Disclosure Statement Depository.

The April 23 Letter requests the Oversight Board respond to your discovery requests on or before May 7, 2021, “in light of the current disclosure statement objection deadline of May 14, 2021.” April 23 Letter at 2. As you are aware, the Court has set the deadline for filing objections to the disclosure statement as the twenty-eighth day following completion of service of the Disclosure Statement Hearing Notice (as defined in the Disclosure Statement Hearing Order). Service of the Disclosure Statement Hearing Notice has not yet begun. Accordingly, the Oversight Board will serve its responses and objections within the time allotted by Federal Rule of Civil Procedure 30(b)(2).

Sincerely,

/s/ Brian S. Rosen
Brian S. Rosen

CC: Margaret A. Dale
Michael T. Mervis
Laura Stafford

Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [ECF No. 16681] (the “Disclosure Statement Hearing Order”).